

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE PR/USPS-7(b)**  
(June 15, 2012)

The United States Postal Service files this partial objection to the above-identified Interrogatory to witness Jeffrey C. Day of the Public Representative filed on June 8, 2012. The objectionable portion of the interrogatory is stated verbatim and followed by a statement of the basis for the objection.

**PR/USPS-T1-7.**

You note that the Postal Service anticipates labor cost savings due to lower salary and benefit costs and a reduction in overall retail window hours. USPS-T-1 at 9.

\* \* \*

b. Please explain if you attempted to measure the impact of POSTPlan and reduced retail hours on Post Office revenue. Please provide an estimate of the impact (positive or negative) on Post Office revenue.

The Postal Service objects to the interrogatory in part because it requests information not required by either the Commission's rules or by statute. Specifically, neither 39 U.S.C. § 3661 nor 39 C.F.R. §§ 3001.71-75 require the Postal Service to document the impact that a change in the nature of postal services will have on Postal Service revenue.

The Postal Service further objects to the interrogatory because it requests pre-decisional, deliberative information. As explained in response to Presiding Officer's Information Request No. 1, Question 11, the Postal Service has made efforts to

estimate the POStPlan's expected impact on revenue, but has been unable to identify or determine any accurate method for doing so.

Finally, by responding to the Presiding Officer's Information Request regarding the POStPlan's impact on Post Office revenue (filed concurrently), the Postal Service does not intend to waive this or future objections to requests for information regarding revenue.

Respectfully submitted,

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